

To: Alisha Johnson/DC/USEPA/US@EPA[]
From: "Magill, Jim" <Jim_Magill@platts.com>
Sent: Fri 10/5/2012 3:14:56 PM
Subject: RE: Enormous Differences between USGS and EPA on Pavillion
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Description: Description: cid:image003.jpg@01CD76E3.39343930
[PERMALINK](#)
[jeff@energyindepth.org](#)
[simon@energyindepth.org](#)
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Alisha,

Can you give me an idea as to when I can expect a response to this inquiry?

Jim

From: Magill, Jim
Sent: Thursday, October 04, 2012 11:54 AM
To: Alisha Johnson (Johnson.Alisha@epamail.epa.gov)
Cc: Magill, Jim
Subject: FW: Enormous Differences between USGS and EPA on Pavillion

Alisha:

I enjoyed speaking to you on the phone this morning. As I told you on the phone, I'm doing a story on analysis being done of the raw data that USGS released recently based on testing at one of two EPA wells near Pavillion, Wyo.

Per your request, I'm sending you the EIS press release and I'd appreciate it if you could comment on the statement that the USGS data is not consistent with the data collected by the EPA and released in the draft report last December.

Also, please comment on the allegation that one of the two wells that EPA drilled near Pavillion suffers from faulty construction.

Does EPA agree that there are problems with the well that made it impossible for USGS to collect samples from that well?

Did the EPA contemplate reworking the well to resolve the problems? If so, what was decided?

Who is the contractor who drilled the wells?

In addition, I'd appreciate it if you could give me any timelines concerning EPA-related activities concerning Pavillion groundwater studies.

Please respond to this inquiry as soon as you can, because I'm writing for a real-time news service and plan to file a story very soon.

Thanks very much for your help. I look forward to hearing from you soon.

Jim Magill

Editor

Platts Gas Daily newsletter

Description: Description: cid:image003.jpg@01CD76E3.39343930
Weds., October 3, 2012 | PERMALINK

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Enormous Differences between USGS and EPA on Pavillion

EPA claims data collected by USGS in Wyoming “generally consistent” with its own – the actual facts tell a different story

To rational observers, it's been clear for months that the EPA blundered in Pavillion, Wyo., and blundered badly. But if you needed more evidence of the EPA's missteps, and the agency's desperation to save face, it came last week from an unexpected source: the federal government itself.

To recap: the EPA issued a preliminary report in December which, according to the Associated Press, “theorized a link between a petroleum industry practice called hydraulic fracturing and groundwater pollution in a Wyoming gas field.” That theory came under fire almost immediately, after the State of Wyoming, EID, and many others identified serious flaws in the data EPA used to support it. For example, EPA's two groundwater monitoring wells were drilled too deep and into a natural hydrocarbon reservoir. There are also special procedures for drilling monitoring wells, but EPA didn't follow them, which means the agency may have introduced foreign substances into the very groundwater it was trying to sample.

When confronted with these flaws, and others, the EPA agreed in March to suspend its investigation, retest the wells, and bring in the U.S. Geological Survey to conduct its own sampling. Under one condition: that USGS could not provide any analysis of the data it collected. Instead, the role of USGS was limited to feeding raw data into the peer-review of EPA's findings, which has not yet begun.

The USGS published that raw data Sept. 26. Almost immediately, an EPA spokeswoman e-mailed reporters to say the USGS report “is generally consistent with groundwater monitoring data previously released by the Environmental Protection Agency.” USGS couldn't say much in reply, other than “USGS did not interpret the data.”

But for those willing to look closely enough at the USGS report, it's hard to see how the EPA can claim the two reports are “generally consistent.” Actually, that statement is highly misleading, because there are glaring inconsistencies between what the EPA and USGS found. So far, Energy In Depth has identified more than 50 individual measurements from the EPA's draft Pavillion report that have been discredited by the USGS. In the chart here to the left, we pull just one of the tables from the draft report and highlight several of those inconsistencies, with the help of an Encana analysis and our own review of the USGS report.

Forty of the measurements, shaded red, were discredited by USGS because EPA's second monitoring well, MW02, was built so poorly that USGS refused to take groundwater quality samples from it. You read that right: USGS flat refused. In eight cases, shaded orange, substances measured by the EPA were not detected by the USGS. And in six cases, shaded blue, the USGS found significantly lower levels than EPA detected. Generally consistent? Hardly.

But it turns out USGS isn't the federal agency to take EPA to task over Pavillion. According to E&E News (sub req'd):

The drilling of the well has also been criticized by another federal agency, the Bureau of Land Management. In a newly surfaced document, BLM State Director Don Simpson criticized EPA's testing procedures in Pavillion as insufficient and called its findings “premature.”

The letter was sent in March in response to EPA's draft Pavillion report, but wasn't posted on the official docket until July, and only came to the attention of reporters in recent days. Based on the following excerpts, the EID team is actually amazed this letter ever saw the light of day:

Bias in the samples obtained from these wells may exist. Possible causes include transfer of shallow contamination into deeper zones through the drilling process, or contamination of samples through the introduction of contamination during the drilling and well installation process...

In addition, the development of these monitor wells appears to be deficient for sampling purposes and groundwater samples from the wells should not be fully trusted until development activities indicate that the wells are yielding formation water untainted by any effects introduced by the drilling, well completion, and sampling process. ...

Only through careful drilling, installation and development can reliable samples of groundwater be obtained...

...observations have shown that large amounts of gas have been found in the shallow subsurface at certain locations.

These observations are anticipated and should not be prematurely used as a line of evidence that support EPA's suggestion that gas has migrated into the shallow subsurface due to hydraulic fracturing or improper well completion until more data is collected and analyzed...

So, to recap: we now have two federal agencies – USGS and BLM – that have joined the State of Wyoming, Encana and others in challenging the validity of EPA's testing in Pavillion. Put another way, there are more federal agencies criticizing the EPA's draft report than defending it. But don't worry: all that criticism is still "generally consistent" with the EPA's theories about hydraulic fracturing in Pavillion, right?

READ MORE:

- Issue alert: Six — Actually, Seven — Questions for EPA on Pavillion
- Issue alert: Pavillion Hearing Raises More Questions for EPA
- PAW president: "The draft report coming out of the EPA is reckless."

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